

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

BARBARA STROUGO, Individually and  
on Behalf of All Others Similarly Situated,

Plaintiff(s),

V.

**Case No. 14-cv-5797 (VM)**

BARCLAYS PLC, BARCLAYS  
CAPITAL, INC., ROBERT DIAMOND,  
ANTONY JENKINS, CHRISTOPHER  
LUCAS, TUSHAR MORZARIA, and  
WILLIAM WHITE,

Defendants.

**CLASS REPRESENTATIVES' UNOPPOSED MOTION FOR PRELIMINARY  
APPROVAL OF CLASS ACTION SETTLEMENT**

Pursuant to Fed. R. Civ. P. 23(e), Class Representatives Mohit Sahni and Joseph Waggoner (together, “Plaintiffs”), individually and on behalf of all Settlement Class Members, hereby move this Court for an order: (i) granting preliminary approval of the proposed Settlement; (ii) approving the proposed notice program with respect to the Settlement Class, including the mailed Notice, the published Publication Notice, and the posting of the Stipulation and its Exhibits on a website maintained by the Claims Administrator; (iii) setting a date for a Settlement Fairness Hearing; and (iv) setting deadlines for the mailing of the Notice and publication of the Publication Notice, for Settlement Class Member objections and Settlement Class Member opt-out notices, for the filing of Plaintiffs’ motion for Final Approval of the Settlement, and for the filing of Lead Counsel’s application for an award of attorneys’ fees and reimbursement of expenses and compensatory awards to Plaintiffs.

This motion is based upon the accompanying Memorandum of Law and Stipulation of Settlement, with its Exhibits, which are filed contemporaneously herewith, and other such matters and argument as the Court may consider at the hearing on this motion.

Significantly, all Defendants do not oppose the relief sought by this motion.

Dated: January 28, 2019

Respectfully submitted,

**POMERANTZ LLP**

/s/ Jeremy A. Lieberman

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***Plaintiffs' Lead Counsel***

**CERTIFICATE OF SERVICE**

I hereby certify that on this, the 28th day of January, 2019, a true and correct copy of the foregoing was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

/s/ Jeremy A. Lieberman  
Jeremy A. Lieberman